

EXHIBIT 17

***REDACTED VERSION OF
DOCUMENT SOUGHT TO
BE SEALED***

EXHIBIT 17

1 Neel Chatterjee (SBN 173985)
nchatterjee@goodwinlaw.com
2 James Lin (SBN 310440)
jlin@goodwinlaw.com
3 **GOODWIN PROCTER LLP**
4 135 Commonwealth Drive
Menlo Park, California 94025
5 Tel.: +1 650 752 3100
Fax.: +1 650 853 1038

6 Brett Schuman (SBN 189247)
bschuman@goodwinlaw.com
7 Shane Brun (SBN 179079)
sbrun@goodwinlaw.com
8 Rachel M. Walsh (SBN 250568)
rwalsh@goodwinlaw.com
9 Hayes P. Hyde (SBN 308031)
hhyde@goodwinlaw.com
10 **GOODWIN PROCTER LLP**
11 Three Embarcadero Center
12 San Francisco, California 94111
Tel.: +1 415 733 6000
Fax.: +1 415 677 9041

13 Hong-An Vu (SBN 266268)
hvu@goodwinlaw.com
14 **GOODWIN PROCTER LLP**
15 601 S. Figueroa Street, 41st Floor
16 Los Angeles, California 90017
Tel.: +1 213 426 2500
Fax.: +1 213 623 1673

17 | Attorneys for Defendant: *Otto Trucking LLC*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

21 || Waymo LLC.

Plaintiff,

V.

24 Uber Technologies, Inc.; Ottomotto LLC; Otto
25 Trucking LLC.

Defendants.

Case No. 3:17-cv-00939-WHA

NOTICE OF INSPECTION

1 PLEASE TAKE NOTICE THAT, pursuant to Rule 34 of the Federal Rules of Civil
2 Procedure and the expedited rules and proceedings in this case, counsel for defendant Otto
3 Trucking LLC and one or more of Otto Trucking's experts (and Special Master John Cooper if he
4 so wishes) will inspect Waymo's network, including how laptops interact with Waymo's network,
5 including the [REDACTED], and the metadata generated from those interactions. As part of the
6 inspection, Otto Trucking will need access to the following:

- 7 1. A Google-issued laptop [REDACTED] that
 - 8 a. Has a standard Google Windows image, the same as what would have been
9 used in that organization on December 11, 2015;
 - 10 b. Runs versions of their endpoint software including [REDACTED] and
11 [REDACTED] in use during the time period in question;
 - 12 c. Contains a user profile to be configured as Local Administrator on that laptop;
 - 13 d. Has a group or user policy that matches that of Anthony Levandowski just prior
14 to his departure. (That means access to all the same resources that Levandowski
15 had);
- 16 2. Administrative access on the [REDACTED] client that allows user to customize rules;
- 17 3. Access to [REDACTED] software on removable media such that Otto Trucking's
18 can install [REDACTED] while connected to the Waymo network;
- 19 4. Access to the entire [REDACTED] network to the same extent that was Anthony
20 Levandowski was provided on December 11, 2015;
- 21 5. Provide the same version of [REDACTED] software on a USB removable media
22 device in order to allow imaging of the laptop in the same manner as was done by
23 the Google Security team;
- 24 6. Access to [REDACTED] log
25 files associated to that laptop computer and created during the time period this
26 work is being performed;
- 27 7. Access to any software and laptop OS versions to replicate the above operations as
28 of December 22, 2015, or documentation that contains information about any

1 modifications to the versions, settings or systems between the time of the original
2 capture and our test so that we can account for variances; and

- 3 8. Waymo's logging software or systems capable of monitoring downloading activity
4 by Google or Waymo employees not discussed in Mr. Brown's declaration be
5 disclosed and made available for testing.

6 Local copies of any files to which Waymo provides access as part of this inspection will be
7 deleted at the end of the inspection. However, Otto Trucking would maintain a copy of any logs
8 and metadata created as part of this inspection.

9 The inspection shall take place on August 17, 2017 beginning at 9 a.m.

10 Dated: August 7, 2017

Respectfully submitted,

11 By: /s/Neel Chatterjee
12 Neel Chatterjee
nchatterjee@goodwinlaw.com
13 Brett Schuman
bschuman@goodwinlaw.com
14 Shane Brun
sbrun@goodwinlaw.com
15 Rachel M. Walsh
rwalsh@goodwinlaw.com
16 Hong-An Vu
hvu@goodwinlaw.com
17 Hayes P. Hyde
hhyde@goodwinlaw.com
18 James Lin
jlin@goodwinlaw.com
19 **GOODWIN PROCTER LLP**

20 Attorneys for Defendant:
21 Otto Trucking LLC

PROOF OF SERVICE.

I am an attorney at the law firm of Goodwin Procter, LLP, whose address is 601 South Figueroa Street, 41st Floor, Los Angeles, CA 90017. I am over the age of 18 and not a party to the within action.

On August 7, 2017, I caused the following documents to be served on all counsel of record via electronic mail, pursuant to the agreement between the parties:

OTTO TRUCKING LLC'S NOTICE OF INSPECTION

Charles K. Verhoeven
David A. Perlson
Melissa Baily
John Neukom
Jordan Jaffe
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111-4788

Counsel for Plaintiff: *Waymo LLC*
Telephone: 415.875.6600
Facsimile: 415.875.6700
QE-Waymo@quinnmanuel.com

David Cooper
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor,
New York, New York 10010

Counsel for Plaintiff: *Waymo LLC*
Telephone: 212.849.7000
Facsimile: 212.849.7100
QE-Waymo@quinnmanuel.com

Leo P. Cunningham
WILSON SONSINI GOODRICH &
ROSATI
650 Page Mill Road
Palo Alto, CA 94304-1050

Counsel for Plaintiff: *Waymo LLC*
Telephone: 650.493.9300
Facsimile: 650.493.6811
lcunningham@wsgr.com

Arturo J. Gonzalez
Daniel Pierre Muino
Eric Akira Tate
Esther Kim Chang
Matthew Ian Kreeger
Michael A. Jacobs
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105

Counsel for Defendants: *Uber Technologies Inc.*
and *Ottomotto LLC*
Telephone: 415.268.7000
Facsimile: 415.268.7522
UberWaymo@mofo.com

Michelle Ching Youn Yang
MORRISON FOERSTER LLP
2000 Pennsylvania Avenue, NW
Washington, DC 20006

Counsel for Defendants: *Uber Technologies Inc.*
and *Ottomotto LLC*
Telephone: 202.887.1500
Facsimile: 202.887.0763
UberWaymo@mofo.com

1 Rudolph Kim
2 MORRISON & FOERSTER LLP
3 755 Page Mill Road
Palo Alto, CA 94304

Counsel for Defendants: *Uber Technologies Inc.*
and *Ottomotto LLC*
Telephone: 650.813.5600
Facsimile: 650.494.0792
UberWaymo@mofo.com

4 Wendy Joy Ray
5 MORRISON & FOERSTER LLP
707 Wilshire Blvd., Suite 6000
6 Los Angeles, CA 90017

Counsel for Defendants: *Uber Technologies Inc.*
and *Ottomotto LLC*
Telephone: 213.892.5200
Facsimile: 213.892.5454
UberWaymo@mofo.com

7 Michael Darron Jay
8 BOIES SCHILLER & FLEXNER LLP
401 Wilshire Boulevard, Suite 850
Santa Monica, CA 90401

Counsel for Defendants: *Uber Technologies Inc.*
and *Ottomotto LLC*
Telephone: 310.752.2400
Facsimile: 310.752.2490
BSF_EXTERNAL_UberWaymoLit@bsfllp.com

10 Meredith Richardson Dearborn
BOIES SCHILLER FLEXNER LLP
11 435 Tasso Street, Suite 205
Palo Alto, CA 94301

Counsel for Defendants: *Uber Technologies Inc.*
and *Ottomotto LLC*
Telephone: 650.445.6400
Facsimile: 650.329.8507
BSF_EXTERNAL_UberWaymoLit@bsfllp.com

13 Hamish Hume
14 Jessica E Phillips
Karen Leah Dunn
15 Kyle N. Smith
Martha Lea Goodman
BOIES SCHILLER FLEXNER LLP
16 1401 New York Ave., NW
Washington, DC 20005

Counsel for Defendants: *Uber Technologies Inc.*
and *Ottomotto LLC*
Telephone: 202.237.2727
Facsimile: 202.237.6131
BSF_EXTERNAL_UberWaymoLit@bsfllp.com

17 John L. Cooper
18 FARELLA BRAUN + MARTEL LLP
235 Montgomery Street, 17th Floor
19 San Francisco, CA 94104

Appointed by Court as: *Special Master*
Telephone: 415.954.4410
Facsimile: 415.954.4480
jcooper@fbm.com
MCate@fbm.com

21 (E-MAIL or ELECTRONIC TRANSMISSION) Based on a court order or an
agreement of the parties to accept service by e-mail or electronic transmission, I caused
the documents to be sent to the persons at the e-mail addresses listed. I did not receive,
within a reasonable time after the transmission, any electronic message or other
indication that the transmission was unsuccessful.

24 I declare under penalty of perjury that the foregoing is true and correct.

25 Executed on **August 7, 2017**, at Los Angeles, California.

26 _____
27 Hong-An Vu
(Type or print name)

/s/Hong-An Vu
(Signature)